

## MEMO ENDORSED

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

AMERICAN GENERAL LIFE  
INSURANCE COMPANY,

Interpleader Plaintiff

vs.

ELIZABETH CLARKE, LASHAN  
BROWN, KRYSTLE WRIGHT,  
NATALIA WRIGHT, ELIJAH BELL'S  
FUNERAL SERVICE, LLC and  
EXPRESS FUNERAL FUNDING, LLC,

Interpleader Defendants.

EXPRESS FUNERAL FUNDING, LLC

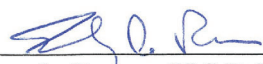
Crossclaim Plaintiff

vs.

ELIZABETH CLARKE, LASHAN  
BROWN, KRYSTLE WRIGHT,  
NATALIA WRIGHT and ELIJAH  
BELL'S FUNERAL SERVICE, LLC,

Crossclaim Defendants.

The motion is denied. The parties are directed to move for default judgment in accordance with the Court's individual rules. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: January 28, 2022  
New York, New York

Cause No. 1:21-cv-03307-ER

### **STIPULATION AND JOINT MOTION FOR ENTRY OF AGREED JUDGMENT**

Defendant/Crossclaim Plaintiff, EXPRESS FUNERAL FUNDING, LLC (herein "EFF"), Interpleader Plaintiff, AMERICAN GENERAL LIFE INSURANCE COMPANY (herein "American General"), and Crossclaim Defendant, LASHAN BROWN (herein "Brown"), hereby stipulate as follows:

1. This Court has subject matter jurisdiction and personal jurisdiction over all the parties.

2. All claims of the parties concerning or relating to the American General Life Insurance Policy Number 10-0215585141 issued to Clinton Deloy Wright on January 20, 2015, (the "Policy") have been resolved by an agreement to the disbursement of the Disputed Proceeds at issue herein.

3. Defendants, ELIZABETH CLARKE, KRYSTLE WRIGHT, NATALIA WRIGHT and ELIJAH BELL'S FUNERAL SERVICE, LLC have been defaulted in this matter (Document Nos 37, 38, 39 and 40).

4. The total amount of the Disputed Proceeds held by American General is \$100,000.00 plus accrued interest.

5. The parties agree that American General should be entitled to retain \$2,500 of the Disputed Proceeds for its attorney fees' and costs incurred in this action.

6. The parties further agree that \$18,465 of the Disputed Proceeds shall be paid to Express Funeral Funding, LLC, mailed to its attorney, Jason A. Lopp, 318 Pearl Street, Suite 200, New Albany, Indiana, 47150.

7. The parties further agree that the balance of the disputed proceeds shall be paid to LaShan Brown.

8. The parties further agree that American General may be discharged from all further liability under the Policy.

9. Defendant Express Funeral Funding, LLC stipulates to the dismissal of its Counterclaim against ELIZABETH CLARKE, LASHAN BROWN, KRYSTLE WRIGHT, NATALIA WRIGHT and ELIJAH BELL'S FUNERAL SERVICE, LLC. (Document 28).

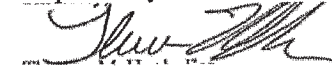
10. This Stipulation and Motion for Entry of Agreed Judgment expresses the full and complete resolution of all claims known or unknown currently existing between the parties hereto concerning or relating to the Policy, whether asserted in this litigation or not.

11. This Stipulation may be executed in counterparts, each of which shall be deemed an original and all of which together shall be considered one and the same document.

12. This case is appropriate for dismissal with prejudice in its entirety, with each party bearing its own costs except as otherwise set out herein.

SO STIPULATED this 27 day of JAN, 2022.

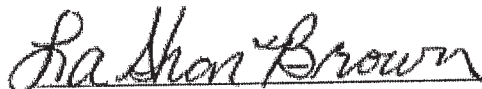
Respectfully submitted,



Thomas M. McHugh  
BRESSLER, AMERY & ROSS, P.C.  
17 State Street, 34th Floor  
New York, NY 10004  
[tmchugh@bressler.com](mailto:tmchugh@bressler.com)  
*Attorney for Plaintiff,*  
*American General Life Insurance*



Jason A. Lopp (IN Atty. No. 21351-29)  
CHURCH LANGDON LOPP & BANET, LLC  
318 Pearl Street, Suite 200  
New Albany, IN 47150  
Telephone: (812) 725-8224  
Email: [jlopp@cllblegal.com](mailto:jlopp@cllblegal.com)  
*Attorney for Defendant,*  
*Express Funeral Funding, LLC*



LaShan Brown  
~~7457 Tamoshanter Blvd.~~  
~~North Lauderdale, FL 33068~~ LB  
P. O. Box 9803  
Ft. Lauderdale, FL 33310

**CERTIFICATE OF SERVICE**

I hereby certify that on January 27, 2022, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Thomas M. McHugh  
BRESSLER, AMERY & ROSS, P.C.  
17 State Street, 34<sup>th</sup> Floor  
New York, NY 10004  
Email: [tmchugh@bressler.com](mailto:tmchugh@bressler.com)

I further certify that on January 27, 2022, I served the foregoing document by causing a copy to be sent via First-Class Mail to the following:

LaShan Brown  
540 NW 4th Avenue, Apt. 2608,  
Fort Lauderdale, FL 33311

s/Jason A. Lopp

Jason A. Lopp